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July 18, 2022

**Electronically filed via CM/ECF**

Hon. Ramon E. Reyes, Jr.  
United States Magistrate Judge  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE: Langford et al. v. Local 15 et al.  
18-CV-07041 (LDH)(RER)**

**Sosa v. Local 15 et al.  
20-CV-00066 (LDH)(RER)**

Dear Judge Reyes,

This office represents the Defendants in the above-referenced cases. On Friday, July 15, 2022, Counsel for the Plaintiffs in these cases filed a consent motion for the extension of certain discovery deadlines. *See* Doc. #30 (Case No. 1:18-CV-07041). Counsel correctly stated that the Defendants do not oppose the extension on the understanding that all of the subsequent discovery deadlines be extended by the same amount of time. Earlier this morning you granted that motion, setting the pre-trial conference for January 17, 2023. We are writing to clarify the Defendants' understanding of the remaining deadlines in this case when it agreed not to oppose Plaintiffs' latest request for an extension.

The original scheduling order approved in this case set a deadline of June 15, 2022 for the completion of the Plaintiffs' expert report. The deadline for Defendants' rebuttal expert disclosures was set three months later, on September 15, 2022. The deadline for the end of all discovery was set for two-and-a-half months later, on November 30, 2022. The pre-trial conference was set for the next business day after the completion of discovery, on December 1, 2022.

In the Plaintiffs' motion, counsel seeks an expert discovery disclosure deadline on August 15, 2022. Thus, moving the other deadlines commensurate with the extension of the Plaintiffs' expert disclosure deadline would yield the following deadlines:

- **November 15, 2022** – Defendants’ rebuttal expert disclosures (3 months after August 15, 2022)
- **January 31, 2023** – Completion of all discovery (two-and-a-half months after November 15, 2022)
- **February 1, 2023** – Pre-trial conference (one business day after the completion of discovery).

When the Defendants agreed not to oppose Plaintiffs’ counsel’s request for an extension, it was working under the assumption that the subsequent deadlines would be extended as described above. This timeframe preserves the parties’ agreement, which was approved by the Court on December 13, 2021.

Accordingly, the Defendants request that the deadline for completion of discovery be set for January 31, 2023, with the pre-trial conference set for February 1, 2023. On July 18, 2022, Counsel for the Plaintiffs indicated via email that he does not oppose this request.

Thank you for your consideration of this clarification and request.

Yours truly,

/s/

Jennifer R. Simon  
Counsel for Defendants